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12 Attorneys for Defendant Whole Foods Market
13 California, Inc. (erroneously sued and served as
Whole Foods Market, Inc.)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FRANCISCA MORALEZ,

Plaintiff,

V.

WHOLE FOODS MARKET, INC.; BOND
CC OAKLAND LLC; and DOES 1-10,
Inclusive.

Defendants

Case No. 4:12-cv-01072-LB
[Complaint Filed March 2, 2012]

**STIPULATION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT: [REDACTED] ORDER**

STIPULATION

3 1. WHEREAS this action was filed by Plaintiff Francisca Moralez on
4 March 2, 2012 and served on Defendant Whole Foods Market California, Inc. (erroneously
5 sued and served as Whole Foods Market, Inc.) ("Defendant") on March 22, 2012;

7 2. WHEREAS April 12, 2012 is the date upon which Defendant must
8 file and serve an answer or otherwise respond to Plaintiff's Complaint;

10 3. WHEREAS good cause exists for an extension of time because
11 Defendant needs additional time to investigate adequately the claims alleged in this matter,
12 as well as all potential defenses and/or counterclaims to those claims;

14 4. WHEREAS Plaintiff does not oppose and has agreed to Defendant's
15 request that it may have through and including May 11, 2012 to answer or otherwise
16 respond to Plaintiff's Complaint:

18 5. WHEREAS the parties have not previously requested extensions of
19 time from this Court:

21 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the
22 parties, through their counsel, that this Court should extend the deadline for Defendant to
23 answer or otherwise respond to Plaintiff's Complaint through and including the date of
24 May 11, 2012.

1 Counsel for Plaintiff has agreed to the electronic filing of this Stipulation and
2 requested that Defendant's counsel submit an electronic signature on his behalf.

3
4 Dated: April 11, 2012

5 LAW OFFICES OF PAUL L. REIN

6
7 By /s/ Paul L. Rein

8 PAUL L. REIN
9 CELIA MCGUINNESS
10 CATHERINE M. CABALO

11
12 Attorneys for Plaintiff
13 Dated: April 11, 2012

14 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

15
16 By /s/ Hayley S. Grunvald

17 RICHARD J. SIMMONS
18 DEREK R. HAVEL
19 HAYLEY S. GRUNVALD

20 Attorneys for Defendant
21 WHOLE FOODS MARKET CALIFORNIA, INC.
22 (ERRONEOUSLY SUED AND SERVED AS
23 WHOLE FOODS MARKET, INC.)

1 **ORDER**

2 Having reviewed and considered the above Stipulation of the parties, and
3 good cause appearing, IT IS SO ORDERED that the deadline for the Defendant Whole
4 Foods Market California, Inc. (erroneously sued and served as Whole Foods Market, Inc.)
5 to respond to the complaint is hereby extended until May 11, 2012.

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7 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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9 DATED: May 8, 2012



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1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF SAN DIEGO**

3 I am employed in the County of San Diego; I am over the age of eighteen years and
4 not a party to the within entitled action; my business address is 501 West Broadway, 19th
Floor, San Diego, California 92101-3598.

5 On **April 12, 2012**, I served the following documents:

6 **STIPULATION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S COMPLAINT**

7 **BY ELECTRONIC MAIL:** I caused the above-entitled documents to be served through
8 CM ECF addressed to all parties appearing on the CM ECF electronic service list for the
9 above-entitled case. The file transmission was reported as completed and a copy of the
CM ECF Filing Receipt will be maintained with the original documents in our office.

10 **Electronic Mail Notice List**

11 The following are those who are currently on the list to receive e-mail notices for this case.

12 Paul L. Rein, Esq.
13 Celia McGuinness, Esq.
14 Catherine M. Cabalo, Esq.
15 **LAW OFFICES OF PAUL L. REIN**
16 200 Lakeside Drive, Suite A
Oakland, CA 94612
Telephone: (510) 832-5001
Facsimile: (510) 832-4787
Attorneys for Plaintiff

17 I declare that I am employed in the office of a member of the bar of this Court at
whose direction the service was made. I declare under penalty of perjury under the laws of
18 the United States of America that the foregoing is true and correct.

19 Executed on **April 12, 2012**, at San Diego, California.

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21 */s/ Hayley S. Grunvald*
22 HAYLEY S. GRUNVALD
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